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June 15, 2018

VIA ECF

Honorable J. Paul Oetken, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *King-Devick Test Inc. v. NYU Langone Hospitals et. al*, Case No. 1:17-cv-09307-JPO

Dear Judge Oetken:

This firm represents Plaintiff King-Devick Test Inc. ("KDT Inc.") in the above-referenced action. We write, with Defendants' consent, to request a 60-day extension of the deadlines in this action. There have been no prior extension requests.

To date, the parties have exchanged initial disclosures and each served and responded to document requests and initial interrogatories from the opposing party. The parties are working diligently on document collection and review. Plaintiff has produced a portion of the early documents it agreed to produce during the April 2, 2018 Initial Pretrial Conference, and expects to produce another set of related documents by June 29, with subsequent productions made on a rolling basis. Defendants expect to produce their first set of documents by June 22 and to make subsequent productions on a rolling basis. In light of this, and Local Civil Rules 33.3(b) and (c), it is not practicable for the parties to meet the upcoming deadline of June 19, 2018 to serve Interrogatories and Requests for Admission. The parties believe that the revised schedule set forth below will allow adequate time for them to proceed with discovery and to prepare appropriately to meet the reset deadlines.

The current and proposed deadlines are set forth below. Under this schedule, discovery would extend beyond a conference that is currently scheduled for August 9, 2018. The parties request that that conference be adjourned, and, as set forth below, propose that the conference be held on or around October 9, 2018, at the Court's convenience.

Event	Current Deadline	Proposed Deadline
Interrogatories to be served	June 19, 2018	August 20, 2018
Requests for Admissions to be served	June 19, 2018	August 20, 2018
Depositions shall be completed	August 2, 2018	October 1, 2018
Fact discovery shall be completed	August 2, 2018	October 1, 2018
Parties' expert disclosures and initial expert reports due	August 7, 2018	October 9, 2018
Case management conference with Judge Oetken	August 9, 2018	October 9, 2018
Deadline for counsel for parties to meet in person to discuss settlement	August 16, 2018	October 15, 2018
Parties' rebuttal expert reports due	September 7, 2018	November 6, 2018
Expert discovery shall be completed	September 20, 2018	November 19, 2018
Deadline to file summary judgment motions	October 4, 2018	December 3, 2018
Deadline to file Joint Pretrial Order (* if no motion for summary judgment is filed)	October 20, 2018	December 19, 2018

For the reasons set forth herein, the parties respectfully request that Your Honor grant this extension of time.

Granted. The parties' proposed discovery schedule is hereby adopted.
The pretrial conference previously scheduled for August 9, 2018, is hereby adjourned to October 9, 2018, at 10:30 a.m.
So ordered:
June 18, 2018

Respectfully submitted,



Natasha Reed



J. PAUL OETKEN
United States District Judge